

January 28, 2008

Dr. Dennis Brooks, Superintendent  
New Albany-Floyd County Consolidated School Corporation #2400  
2813 Grant Line Road, P.O. Box 1087  
New Albany, Indiana 47150-1087

Dear Dr. Brooks:

On December 10, the Indiana Department of Education's monitoring team commenced an on-site monitoring review of the New Albany-Floyd County Consolidated School Corporation's administration of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB). Enclosed is a report based upon this review.

Prior to, during, and following the on-site monitoring review, the IDOE team conducted a number of activities (described in the attached report) to verify compliance with 1) the programmatic requirements of Title I, Part A; and 2) the fiscal requirements that must be followed by recipients of Title I, Part A educational funds.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **New Albany-Floyd County Consolidated School Corporation is responsible for taking appropriate action to remedy compliance deficiencies**. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer term measures are necessary, New Albany-Floyd County Consolidated School Corporation must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will be happy to provide technical assistance to New Albany-Floyd County Consolidated School Corporation where appropriate.

The IDOE team would like to thank you, Bill Briscoe, Michele Day, Fred McWhorter and other staff for their work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting New Albany-Floyd County Consolidated School Corporation to improve the delivery of Title I services.

Sincerely,

Lee Ann Kwiatkowski, Director  
Division of Compensatory Education

cc: Michele Day, Title I Program Administrator  
New Albany-Floyd County Consolidated School Corporation #2400

Linda Miller, Assistant Superintendent of Community Relations  
and Special Populations, IDOE

**Indiana Department of Education  
Title I, Part A Monitoring**

**District:** New Albany-Floyd County Consolidated School Corporation

**Monitoring Date:** December 10, 2007

**Monitoring Team:** Lee Ann Kwiatkowski, Sarah Pies, Laura Cope, Brenda Martz, Hazel Beasley, and Linda Ricketts

**Background Information**

The Indiana Department of Education (IDOE) commenced on-site monitoring of the New Albany-Floyd County Consolidated School Corporation on December 10, 2007. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with Title I, Part A and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

Monitoring Topic	Statutory Citation
1) Compliance with professional qualification requirements for teachers and paraprofessionals	NCLB §1111(h)(6)(A) NCLB §1119(c)(1) NCLB §9101(23)
2) Compliance with parental involvement requirements	NCLB §1118(a)-(h) NCLB §1111(c)(14) NCLB §1111(d) NCLB §1116(a)(1)(D) NCLB §9101(32)
3) Compliance with professional development requirements	NCLB §1116(a)(1)(D) NCLB §9101(34)
4) Compliance with school improvement requirements	NCLB §1116(b) NCLB §1116(c) NCLB §1116(e)
5) Compliance with district improvement requirements	NCLB §1116(c)
6) Compliance with schoolwide program requirements	NCLB §1114
7) Compliance with targeted assistance program requirements	NCLB §1115
8) Compliance with school ranking and serving requirements	NCLB §1113
9) Compliance with comparability requirement	NCLB §1120A

10) Compliance with maintenance of effort requirement	NCLB §1120A NCLB §9521
11) Compliance with equitable services to private school students requirements	NCLB §1120
12) Compliance with statutory set-aside requirements	NCLB §1113 NCLB §1116 NCLB §1118
13) Compliance with supplement, not supplant requirements	NCLB §1120A
14) Compliance with financial management systems requirements	EDGAR §80.20 EDGAR §80.36
15) Compliance with compensation for personnel services requirements	OMB Circular A-87, Attachment B, Section 8
16) Compliance with complaint procedures	Subpart F—Complaint Procedure (CFR, Title 34)
17) Compliance with equipment requirements	EDGAR §80.32 OMB Circular A-87
18) Compliance with Neglected Institutes	NCLB §1401
19) Compliance with Delinquent Institutes	NCLB §1401

During the on-site visit, IDOE spent time interviewing staff from New Albany-Floyd County Consolidated School Corporation at their central office. In addition, IDOE visited two schools, where interviews were conducted with the principal and the Title I staff.

IDOE also reviewed New Albany-Floyd County Consolidated School Corporation documents, including LEA policies and procedures, LEA notices to parents, LEA plans, school plans, personnel information, budget documents, contracts, and expenditure reports.

Based on the above information, our report follows.

## **Monitoring Topic 1: Compliance with NCLB professional qualification requirements for teachers and paraprofessionals**

### **Background**

IDOE interviewed the Title I Program Administrator and building principals. In addition, IDOE reviewed letters to personnel, and notices to parents.

*Statutory Requirement: Professional qualifications requirements are contained in Sections 1111 and 1119 of Title I. In addition, “highly qualified” is defined in Section 9101(23) of the general provisions section of NCLB.*

### **Areas of Compliance**

**Principal Attestation:** New Albany-Floyd County Consolidated School Corporation ensures that the principal of the school receiving Title I funds has attested annually, in writing, as to whether the school is in compliance with the professional qualification requirements of NCLB. As part of the annual application review, grant approval is not given unless each principal has signed a template attesting that their school is in compliance with the professional qualification requirements of NCLB.

**Title I Instructional Paraprofessional Requirements:** All Title I instructional paraprofessionals meet the statutory requirements for highly qualified. The instructional paraprofessionals work under the direct supervision of a licensed teacher. The teacher prepares the lesson plans and plans the support activities that the paraprofessional carries out, and evaluates the achievement of the students with whom the paraprofessional is working. The paraprofessionals work in the classroom; this ensures that the paraprofessional is working in close and frequent proximity to the teacher.

**Professional qualification requirements:** New Albany-Floyd County Consolidated School Corporation produced evidence demonstrating the teachers currently meet the highly qualified teacher requirements. Veteran teachers did complete the HOUSS.

**Parents’ Right to-Know re: request for teacher qualifications:** New Albany-Floyd County Consolidated School Corporation was able to demonstrate that letters had been mailed to all parents of students attending the Title I schools.

**Parents’ Right to-Know re: non-highly qualified teacher:** New Albany-Floyd County Consolidated School Corporation provided evidence that parents were notified in writing that their child was taught for 4 or more consecutive weeks by a teacher in a core academic subject who was not highly qualified.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1**

None

## **Monitoring Topic 2: Compliance with parental involvement requirements**

### **Background**

IDOE interviewed the Title I Program Administrator and building principals.

*Statutory Requirement: Parental involvement requirements are contained throughout Title I, specifically in Sections 1111, 1116, and 1118. In addition, parental involvement is defined in Section 9101(23) of the general provisions section of NCLB. (See Attachment A)*

### **Areas of Compliance**

**Annual meeting:** Both the Children's Academy and Pine View schools held an annual parent meeting. New Albany-Floyd County Consolidated School Corporation provided evidence of sign-in sheets and PowerPoint presentation from the meeting.

**Building schools' and parents' capacity for strong parental involvement:** New Albany-Floyd County Consolidated School Corporation showed that both The Children's Academy and Pine View were building parent's capacity in a variety of ways. Both schools had a recognition program for parents that participated in five events throughout the year. This was documented for each classroom. Weekly and monthly calendars are sent home to parents containing parent activities going on at the schools. The parent facilitator at Beck and Monger is doing a great job coordinating activities for parents to participate in their child's education. Workshops are being provided to parents.

**Parent Information Resource Center:** New Albany-Floyd County Consolidated School Corporation provided evidence that parents were notified of the existence of the Parent Information Resource Center. Documentation of mailing and flyers were provided in English and Spanish.

**Reviews Effectiveness of Parental Involvement Activities:** New Albany-Floyd County Consolidated School Corporation provided evidence that they review the effectiveness of school parent involvement activities. Parents are given surveys after parent workshops and input is given on what else the parents need. New Albany-Floyd County Consolidated School Corporation plotted responses to several years' surveys on a graph. The Parent Teacher Organization develops action steps and action plans for parent activities. Surveys are also given during parent-teacher conferences.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2**

**LEA Parental Involvement Policy:** New Albany-Floyd County Consolidated School Corporation provided evidence of an LEA Parental Involvement Policy, but it did not contain all required components. (See Attachment A)

**Required Action:** The LEA was proactive and already provided evidence of the meeting to revise the LEA Parent Involvement Policy to ensure all statutory components were included. The sign-in sheets included parents, teachers and administrators. New Albany-Floyd County Consolidated School Corporation must send the IDOE by May 30<sup>th</sup> the revised 2008-2009 LEA Parent Involvement Policy containing the required components.

**School Parental Involvement Policy:** Although the Children's Academy's School Parent Involvement Policy contained the required components, Pine View's revealed that essential components were missing from the policy. Parents at both the Children's Academy and Pine View were actively involved in the joint development of the plan. (See Attachment B and C)

**Required Action:** New Albany-Floyd County Consolidated School Corporation must ensure that all Title I schools have School Parental Involvement Policies that contain the required components as stated in Sec. 1118 in order to be in compliance with NCLB requirements.

In addition, New Albany-Floyd County Consolidated School Corporation must submit to the IDOE School Parent Involvement Policy from Pine View to verify compliance with NCLB requirements by May 30<sup>th</sup> for the 2008-2009 school year.

**School-Parent Compact:** New Albany-Floyd County Consolidated School Corporation provided evidence that schools have developed School-Parent Compacts, but they were not compliant with the requirements of Sec. 1118. The Children's Academy and Pine View had compacts, but they did not contain all the required components. (See Attachment D and E)

**Required Action:** New Albany-Floyd County Consolidated School Corporation must ensure that all Title I schools have a School-Parent Compact which contains all the required components as stated in Sec. 1118 in order to be in compliance with NCLB requirements.

In addition, New Albany-Floyd County Consolidated School Corporation must submit to the IDOE School-Parent Compacts from the Children's Academy and Pine View by May 30<sup>th</sup> for the 2008-2009 school year.

### **Monitoring Topic 3: Compliance with school improvement requirements**

#### **Background**

IDOE interviewed the Title I Program Administrator and building principals to discuss school improvement issues.

*Statutory Requirement: School improvement, corrective action, restructuring, and alternative governance requirements, including proper implementation of public school choice and supplemental educational services are contained in Section 1116.*

*Depending on the number of years a school has not made adequate yearly progress (AYP), the school, district, and in certain cases state, must take certain actions.*

#### **Areas of Compliance**

**Public School Choice:** New Albany-Floyd County Consolidated School Corporation demonstrated that it is in compliance with the Public School Choice requirement. New Albany-Floyd County Consolidated School Corporation provided evidence that parents were notified of their school choice option and is keeping required documentation of student transfers.

**Peer Review of Improvement Plans:** New Albany-Floyd County Consolidated School Corporation demonstrated that it has a process for presenting school improvement plans to the LEA administrators and the review process ensures that the plans are peer reviewed. New Albany-Floyd County Consolidated School Corporation ensured that the school improvement plans are peer reviewed before the school board approves the plans.

**Supplemental Educational Services (SES):** New Albany-Floyd County Consolidated School Corporation provided evidence that students receiving SES services are in compliance. Evidence was provided that parents received notification and that SES services are being tracked by the LEA.

#### **Findings of Non-Compliance, Required Actions, and Recommendations, and concerns for Monitoring Topic 4**

##### **Other Matters:**

**School Improvement Plans:** New Albany-Floyd County Consolidated School Corporation was able to demonstrate that Pine View Elementary developed a school improvement plan; but this plan does not contain most of the necessary statutory components.

New Albany-Floyd County Consolidated School Corporation should be commended on their pro-active approach after the peer review for Pine View in 2006-2007.



After discovering, in the peer review, Pine View's school improvement plan did not contain all the required components, New Albany-Floyd County Consolidated School Corporation had the school go through schoolwide planning with state approved providers for the 2007-2008 school year. (See Attachment F)

**Required Action:** New Albany-Floyd County Consolidated School Corporation must ensure that all schools identified for school improvement have developed a school improvement plan consistent with NCLB components and timelines. Consultants are currently working with Pine View Elementary to incorporate the required components into their existing plans. In addition, the revised school improvement plan for 2008-2009 must be sent to the IDOE before the start of the school year.

#### **Monitoring Topic 4: Compliance with district improvement requirements**

##### **Background**

IDOE interviewed the Program Administrator and building principals to discuss LEA improvement requirements.

*Statutory Requirement: District (local educational agency) improvement requirements are contained in §11116(c).*

##### **Recommendation:**

**Comprehensive LEA Improvement Plan:** New Albany-Floyd County Consolidated School Corporation has a LEA improvement plan that meets the statutory components required by Title I and NCLB. The corporation is currently working with the IDOE and Great Lakes East Comprehensive Center (GLECC). The IDOE recommends that New Albany-Floyd County Consolidated School Corporation ensures that all principals, teachers and parents are aware of the LEA improvement plan and that the plan applies to all schools in the LEA.

##### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 4**

None

## **Monitoring Topic 5: Compliance with schoolwide program requirements**

### **Background**

IDOE interviewed the Title I Program Administrator and the building principals regarding schoolwide program requirements.

*Statutory Requirement: The schoolwide program requirements are contained in Section 1114. In general, in an eligible schoolwide program school federal, state, and local funds can be combined to upgrade the entire educational program (except Reading First funds). Unlike a targeted assistance school, where certain students must be identified for Title I services, in a schoolwide program school all students are considered to be eligible for services and the goal is to upgrade the entire educational program of the school. In addition, in a schoolwide school, schools are not required to maintain separate fiscal records, by program, that identify activities supported with particular funds as long as the school maintains records that demonstrate that the schoolwide program, as a whole, addresses the intent and purposes of each Federal program that was consolidated.*

### **Areas of Compliance**

**LEA Guidance to Schools:** New Albany-Floyd County Consolidated School Corporation was able to show evidence that the LEA provides guidance to schools regarding the development, implementation, and evaluation of schoolwide programs.

### **Findings of Non-Compliance, Required Actions, and Recommendations, and concerns for Monitoring Topic 5**

**Schoolwide Program Plans:** The Children's Academy had a schoolwide plan that contained the required components; however, Pine View's plan did not contain the ten statutory components required in a schoolwide program (SWP) plan. (See Attachment G)

**Required Action:** As mentioned in Topic 3, New Albany-Floyd County Consolidated School Corporation should be commended on their pro-active approach after the peer review for Pine View in 2006-2007. The revised schoolwide plan for 2008-2009 must be sent to the IDOE before the start of the school year.

**Evaluation of schoolwide program effectiveness:** New Albany-Floyd County Consolidated School Corporation ensures that schools update their schoolwide plans each year. The LEA monitors purchase orders and professional development. However, there was not evidence that the plans are evaluated to determine their effectiveness.

**Required Action:** New Albany-Floyd County Consolidated School Corporation must conduct an evaluation to show evidence that participating students are

demonstrating academic growth. New Albany-Floyd County Consolidated School Corporation must use the data gathered from each program to determine their overall effectiveness with students who are failing or are most at-risk of failing.

## **Monitoring Topic 6: Compliance with targeted assistance program requirements**

### **Background**

IDOE interviewed the Title I Program Administrator regarding targeted assistance school program requirements.

*Statutory Requirement: The targeted assistance program requirements are contained in Section 1115. In a targeted assistance school, a school must maintain a list of eligible children who receive Title I services. Eligible children are children identified by the school as failing, or most at risk of failing, to meet the State's challenging student academic achievement standards.*

### **Areas of Compliance**

**Proper Use of Funds:** New Albany-Floyd County Consolidated School Corporation provided evidence that Title I funds are being expended for identified students only.

**Integration of Staff:** New Albany-Floyd County Consolidated School Corporation provided evidence that staff supported with targeted assistance funds are integrated into the regular school program, including professional development.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 6**

**Student Eligibility and Selection:** New Albany-Floyd County Consolidated School Corporation provided evidence that students were selected for Title I services based on multiple educationally related, objective, uniformly applied criteria given to all students at each grade level targeted; however, students receiving Special Education services were not selected.

**Required Action:** New Albany-Floyd County Consolidated School Corporation must ensure that the students receiving Title I services are most at risk of failing. If a student is eligible for Title I services but the services were not supplemental, a reason for not serving must be explained on the student selection form.

## **Monitoring Topic 7: Compliance with school ranking and serving requirements**

### **Background**

IDOE interviewed the Title I Program Administrator regarding the Title I ranking and serving requirements. In addition, IDOE reviewed documentation related to this requirement.

*Statutory Requirement: The ranking and serving requirements are contained in Section 1113.*

### **Areas of Compliance**

**Ranking and serving:** New Albany-Floyd County Consolidated School Corporation demonstrated compliance with the ranking and serving requirements.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 7**

None

## **Monitoring Topic 8: Compliance with comparability requirement**

### **Background**

IDOE interviewed the Title I Program Administrator regarding the Title I comparability requirement.

*Statutory Requirement: The comparability requirement is contained in Section 1120A.*

### **Areas of Compliance**

**Comparability:** New Albany-Floyd County Consolidated School Corporation met compliance with comparability requirements.

### **Recommendation:**

**Comparability:** The IDOE gave technical assistance to New Albany-Floyd County Consolidated School Corporation on their comparability report. The IDOE recommends New Albany-Floyd County Consolidated School Corporation read the comparability guidance provided on the Division of Title I website at:  
[http://www.doe.state.in.us/TitleI/comparability\\_info.html](http://www.doe.state.in.us/TitleI/comparability_info.html)

## **Monitoring Topic 9: Compliance with maintenance of effort requirement**

### **Background**

The Indiana Department of Education conducts yearly review of maintenance of effort for all Title I schools.

*Statutory Requirement: The maintenance of effort requirements are contained in Section 1120A of Title I and Section 9521 of the general provisions section of NCLB.*

### **Areas of Compliance**

New Albany-Floyd County Consolidated School Corporation is in compliance with the maintenance of effort requirement.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 9**

None

## **Monitoring Topic 10: Compliance with equitable services to private school students' requirements**

### **Background**

IDOE interviewed the Title I Program Administrator regarding equitable services to private school students. In addition, IDOE reviewed documentation related to this requirement.

*Statutory Requirements: The equitable services requirements are contained in Section 1120.*

### **Areas of Compliance**

**Equitable Services Requirements:** New Albany-Floyd County Consolidated School Corporation demonstrated compliance with equitable services requirements of Title I, Part A with regard to expenditure requirements and the allocation requirements.

**Documentation of poverty:** New Albany-Floyd County Consolidated School Corporation provided documentation that participating nonpublic school children are residents of an eligible school attendance area. Free and reduced lunch data was the method used for documenting poverty data.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 10**

**Nonpublic Title I Program:** New Albany-Floyd County Consolidated School Corporation could not provide evidence that the nonpublic school components of the Title I program are administered by and under the control of the LEA. New Albany-Floyd County Consolidated School Corporation could not provide evidence of meetings with the nonpublic school after the initial meeting at the beginning of the program and could not document regular visits by the LEA to the nonpublic school.

**Required Action:** New Albany-Floyd County Consolidated School Corporation must ensure the LEA is in control of the Title I nonpublic school program.

**Student Selection:** New Albany-Floyd County Consolidated School Corporation was unable to provide evidence that their process for student selection meets statutory requirements for serving nonpublic students. New Albany-Floyd County Consolidated School Corporation could not provide evidence of multiple criteria used to rank, students served matched the rank order listing, and parent refusals for nonpublic school participants.

**Required Action:** New Albany-Floyd County Consolidated School Corporation must ensure that the student selection process for nonpublic schools follows the requirements as stated in Section 1120. This includes using multiple, educationally related, objective criteria for students at the nonpublic schools, and

that students are residents of an eligible school attendance area when selecting students for Title I services and matching the rank order listing. New Albany-Floyd County Consolidated School Corporation must submit to the IDOE student selection sheets of participating nonpublic school students and that the students served match the rank order listing by May 30<sup>th</sup>.

**Consultation:** New Albany-Floyd County Consolidated School Corporation could not provide evidence that consultation occurred between the LEA and nonpublic school officials regarding the planning, design, implementation and participation in Title I.

**Required Action:** New Albany-Floyd County Consolidated School Corporation must ensure meaningful consultation is conducted with the nonpublic school on an ongoing basis including the planning, design, implementation and participation in Title I.

**Evaluation of Program:** New Albany-Floyd County Consolidated School Corporation was unable to provide evidence that the nonpublic school components of Title I are evaluated by the LEA.

**Required Action:** New Albany-Floyd County Consolidated School Corporation must ensure that as part of the consultation process, they make a determination as to what standards and assessments will be used to measure the annual progress of the Title I programs provided to nonpublic school participants. New Albany-Floyd County Consolidated School Corporation must provide the IDOE with a detailed description of the procedures it will use to ensure the correct implementation of this requirement with the response to the report.

## **Monitoring Topic 11: Compliance with statutory set-aside requirements**

### **Background**

IDOE interviewed the Title I Program Administrator regarding the Title I statutory set-aside requirements.

*Statutory Requirements: The statutory set-aside requirements are contained throughout Title I, including required reservations for neglected and delinquent children; homeless children, public school choice, supplemental educational services, school improvement, parental involvement and professional development (see Sections 1113, 1116, and 1118).*

### **Areas of Compliance**

**Homeless:** In 2006-2007 New Albany-Floyd County Consolidated School Corporation set aside funds for homeless students in non-Title I schools. New Albany-Floyd County Consolidated School Corporation appropriately used the funds to tutor students in non-Title I buildings.

**5 Percent Highly Qualified:** New Albany-Floyd County Consolidated School Corporation did not set aside funds for professional development because all teachers in core academic subject areas are highly qualified.

**1 percent Parental Involvement with 95 percent being used at the schools:** Parental involvement funds were set aside and expended. New Albany-Floyd County Consolidated School Corporation tracked the funds through expenditures and did not have carryover for the 2006-2007 school year.

**10 percent Professional Development:** New Albany-Floyd County Consolidated School Corporation set aside and expended funds for LEA Improvement. Funds were tracked through a monthly green bar print out and tracked throughout the year.

**Choice Transportation and SES:** New Albany-Floyd County Consolidated School Corporation used general funds for Choice related transportation. New Albany-Floyd County Consolidated School Corporation appropriately expended funds for SES.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 11**

None



## **Monitoring Topic 12: Compliance with supplement, not supplant requirements**

### **Background**

IDOE interviewed the Title I Program Administrator regarding the Title I supplement, not supplant requirements.

*Statutory Requirement: Section 1120A requires Title I funds to supplement, not supplant non-Federal sources of funds.*

### **Areas of Compliance**

**Supplement, not Supplant:** New Albany-Floyd County Consolidated School Corporation provided evidence that the targeted assistance program and schoolwide program expenditures were used to meet the statutory requirements for such programs and did not supplant non-federal resources.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 12**

None

## **Monitoring Topic 13: Compliance with financial management systems requirements**

### **Background**

IDOE interviewed the Title I Program Administrator and building principals regarding New Albany-Floyd County Consolidated School Corporation's financial management system.

*Regulatory Requirement: Section 80.20 (b)-(i) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements financial management systems for non-State grantees (such as school districts). (See Attachment F)*

### **Areas of Compliance**

**Internal Control:** New Albany-Floyd County Consolidated School Corporation could provide evidence that they have internal controls of their Title I funds.

**Final Expenditure Report:** New Albany-Floyd County Consolidated School Corporation provided evidence that the final expenditure report matched the total Title I budget page in their 2006-2007 application.

**Expenditure Monitoring Systems:** New Albany-Floyd County Consolidated School Corporation filed quarterly monitoring and expenditure reports for the 2006-2007 school year.

**Contracted Services:** New Albany-Floyd County Consolidated School Corporation provided evidence that measures are in place to ensure contracted services (consultants) are working the amount of time for which they are paid.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 13**

#### **Recommendation:**

**Purchase Orders and Expenditures:** New Albany-Floyd County Consolidated School Corporation could not provide evidence that building principals and Title I staff knew the process of purchasing items with Title I funds. IDOE recommends New Albany-Floyd County Consolidated School Corporation ensure that all stakeholders know the appropriate process for purchasing items with Title I funds.

## **Monitoring Topic 14: Compliance with compensation for personnel services requirements**

### **Background**

IDOE interviewed the Title I Program Administrator in regard to the compensation for personnel services requirements.

*Circular Requirement: OMB Circular A-87, Attachment B, Section 8 details the requirements for all compensation for personnel services supported with federal funds. This section includes the time distribution and semi-annual certification requirements.*

### **Areas of Compliance**

**Compensation for personnel services requirements:** New Albany-Floyd County Consolidated School Corporation was able to demonstrate sufficient compliance with the requirements of OMB Circular A-87, Attachment B, Section 8.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 14**

None

## **Monitoring Topic 15: Compliance with complaint procedure**

### **Background**

IDOE interviewed the Title I Program Administrator regarding New Albany-Floyd County Consolidated School Corporation's complaint procedure.

*Regulatory Requirement: The SEA must adopt complaint procedures. The LEA must incorporate the elements required by NCLB for formal complaint procedures into local complaint procedure policies. The LEA must issue appropriate guidance to the schools. Complaint procedures are contained in Subpart F—Complaint Procedure (CFR, Title 34).*

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 15**

#### **Recommendation:**

**Complaint Procedure:** New Albany-Floyd County Consolidated School Corporation has a complaint procedure policy; however, the complaint policy could not be provided at Pine View and the Children's Academy. The IDOE recommends New Albany-Floyd County Consolidated School Corporation ensure the LEA complaint procedure policy is available for all parents at each school. The policy must be in reasonable access to parents.

## **Monitoring Topic 16: Compliance with equipment requirements**

### **Background**

IDOE interviewed the Title I Program Administrator and a building principals regarding equipment acquired with Title I, Part A funds.

*Regulatory Requirement: Section 80.32(b)-(h) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements for the use, management and disposition of equipment acquired with federal funds by non-State grantees (such as school districts).*

### **Areas of Compliance**

**Labeling of equipment and technology:** New Albany-Floyd County Consolidated School Corporation was able to show that equipment at the schools visited was appropriately labeled and stamped.

**Disposition of Equipment policy:** New Albany-Floyd County Consolidated School Corporation provided evidence of a Disposition of Equipment policy.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 16**

**LEA inventory list:** New Albany-Floyd County Consolidated School Corporation has an inventory list; however, the inventory list at Pine View and the LEA did not include all of the requirements from EDGAR 80.32. The inventory list at the Children's Academy contained all components from EDGAR.

**Required Action:** New Albany-Floyd County Consolidated School Corporation must update their inventory list for the LEA and Pine View Elementary. The IDOE recommends using the Children's Academy's inventory list as a model. New Albany-Floyd County Consolidated School Corporation must submit the revised inventory list to the IDOE by May 30<sup>th</sup>.

## **Monitoring Topic 17: Compliance with Neglected Institutions: Funded through Title I, Part A**

### **Background**

IDOE interviewed the Title I Administrator regarding compliance with neglected institutions.

**Definition of facility:** A public or private residential facility, other than a foster home, that is operated for the care of children who have been committed to the institution or voluntarily placed in the institution under applicable State law, due to abandonment, neglect, or death of their parents or guardian.

### **Areas of Compliance**

**Highly Qualified Staff:** New Albany-Floyd County Consolidated School Corporation provided documentation through state licenses and HOUSSE documentation that individuals working within the neglected institution met the highly qualified requirements.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 17**

**Implementation of Services and consultation:** New Albany-Floyd County Consolidated School Corporation did not provide evidence that meaningful and on-going consultation takes place with the neglected institution.

**Required Action:** New Albany-Floyd County Consolidated School Corporation must provide IDOE with a plan to ensure that on-going consultation is occurring with the neglected institution's official. New Albany-Floyd County Consolidated School Corporation must have direct oversight of the program.

## **Monitoring Topic 18: Compliance with Delinquent Institutions: Funded through Title I, Part D, Subpart 2**

New Albany-Floyd County Consolidated School Corporation does not have any delinquent institutions funded through Title I, Part D, Subpart 2.

# Attachment A

## New Albany-Floyd County Consolidated School Corporation LEA Parental Involvement Policy

**Local Educational Agency (LEA) Parental Involvement Policy:** Sec. 1118 (a) (2) Each LEA shall develop jointly with, agree on with, and distribute to, parents of participating children a written parent involvement policy. The policy shall describe how the agency will:

### Parental Involvement Policy Requirements:

		Compliant
1.	Involve parents in the joint development of the plan and the process of school review and improvement	Yes
2.	Provide the coordination, technical assistance, and other support necessary to assist participating schools in planning and implementing effective parent involvement activities to improve student academic achievement and school performance	Yes
3.	Build the schools' and parents' capacity for strong parental involvement by <ul style="list-style-type: none"> <li><input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children</li> <li><input type="checkbox"/> <u>Providing materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology, as appropriate to foster parental involvement</u></li> <li><input type="checkbox"/> <u>Coordination and integrating parental involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool and other programs and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children</u></li> <li><input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school</li> <li><input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children</li> <li><input type="checkbox"/> Other reasonable support for parental involvement activities under section 1118 as parents may request</li> </ul>	Missing underlined components
4.	Coordinate and integrate parental involvement strategies under Title I with strategies under other programs such as Head Start, Reading First, Early Reading First, Even Start, Parents as Teachers, and Home Instruction Program for Preschool Youngsters, and State-run preschool programs	Yes
5.	Conduct, with the involvement of parents, an annual evaluation of the content and effectiveness of the parental involvement policy in improving the academic quality of the schools served under this part, including identifying barriers to greater participation by parents in activities (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background) and use the findings of such evaluation to design strategies for more effective parental involvement, and to revise, if necessary, the parental involvement policies	Yes-
6.	Involve parents in the activities of the schools served under Title I	Yes

## Attachment B

### Pine View Elementary School Parent Involvement Policy

**School Parental Involvement Policy:** Section 1118 (b) Each Title I school shall jointly develop with, and distribute to, parents of participating children a written parental involvement policy, agreed on by such parents, that shall describe the means for carrying out the following requirements listed below.

Requirements of School Parental Involvement Policy		Compliant
1. Convened an annual meeting at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A, and to explain the requirement of such and the right of the parents to be involved		Yes
2. Offered a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement		Yes
3. Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy		Yes
4. Provide parents with:		Yes
<input type="checkbox"/> Provide timely information about Title I programs		
<input type="checkbox"/> A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet		
<input type="checkbox"/> <u>If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible</u>		
5. (SWP schools) If the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA		No
6. Includes a School-Parent Compact (see checklist next page)		Yes
7. Build the schools' and parents' capacity for strong parental involvement by:		Yes
<input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children		
<input type="checkbox"/> Providing materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, to foster parental involvement		
<input type="checkbox"/> Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children		
<input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school		
<input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand		
<input type="checkbox"/> Other reasonable support for parental involvement activities as parents may request		

## Attachment C



# The Children's Academy

## School Parent Involvement Policy

**School Parental Involvement Policy:** Section 1118 (b) Each Title I school shall jointly develop with, and distribute to, parents of participating children a written parental involvement policy, agreed on by such parents, that shall describe the means for carrying out the following requirements listed below.

### Requirements of School Parental Involvement Policy

1. Convened an annual meeting at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A, and to explain the requirement of such and the right of the parents to be involved	Compliant Yes
2. Offered a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement	No
3. Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy	Yes
4. Provide parents with: <ul style="list-style-type: none"> <li><input type="checkbox"/> Provide timely information about Title I programs</li> <li><input type="checkbox"/> A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet</li> <li><input type="checkbox"/> <u>If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible</u></li> </ul>	No-missing <u>underlined</u>
5. (SWP schools) If the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA	No
6. Includes a School-Parent Compact (see checklist next page)	Yes
7. Build the schools' and parents' capacity for strong parental involvement by: <ul style="list-style-type: none"> <li><input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children</li> <li><input type="checkbox"/> Providing materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, to foster parental involvement</li> <li><input type="checkbox"/> <u>Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children</u></li> <li><input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school</li> <li><input type="checkbox"/> <u>Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand</u></li> <li><input type="checkbox"/> <u>Other reasonable support for parental involvement activities as parents may request</u></li> </ul>	No-missing <u>underlined</u>

## Attachment D

### Pine View Elementary

## School – Parent Compact

**School-Parent Compacts:** As a component of the school-level parental involvement policy, each Title I school shall jointly develop with parents for all children served, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parent will build and develop a partnership to help children achieve the State's high standards. Such compact shall:

**School-Parent Compact shall include:**

1. Describe the school's responsibility to provide high quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the state's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time
2. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum:
  - ☐ Parent-teacher conferences in elementary school, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement
  - ☐ Frequent reports to parents on their children's progress
  - ☐ Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities

**Compliant  
No-missing  
underlined**

**No-missing  
underlined  
component**

**Attachment E  
The Children's Academy**

## School – Parent Compact

**School-Parent Compacts:** As a component of the school-level parental involvement policy, each Title I school shall jointly develop with parents for all children served, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parent will build and develop a partnership to help children achieve the State's high standards. Such compact shall:

**School-Parent Compact shall include:**

1. Describe the school's responsibility to provide high quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the state's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time
2. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum:
  - ☐ Parent-teacher conferences in elementary school, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement
  - ☐ Frequent reports to parents on their children's progress
  - ☐ Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities

**Compliant  
Yes**

**No-missing  
underlined  
component**

**Attachment F  
Pine View Elementary**

## School Improvement Plan

**School Improvement Plan:** According to Sec. 1116 (b) (3) (A) after identification as a school in improvement, each school identified as in improvement shall, not later than 3 months after being so identified, develop or revise a school plan in consultation with parents, school staff, the LEA, and outside experts, for approval by such LEA. The school plan shall cover a 2-year period and include:

\*Consolidated plans are encouraged and accepted.

Ten Components of School Improvement Plan*	Compliant
1. Strategies based on scientifically based research strategies to strengthen core academic subjects that addresses the specific academic issues that caused the school to be identified for school improvement	Yes
2. Policies and practices concerning core academic subjects that have the greatest likelihood that all groups of students will meet the proficient level on the ISTEP+	No
3. Assurance that the school will spend not less than 10% each year to provide high quality professional development that: <ul style="list-style-type: none"> <li><input type="checkbox"/> Directly address the academic achievement problem that caused the school to be identified</li> <li><input type="checkbox"/> Meets NCLB's professional development requirements</li> <li><input type="checkbox"/> Provides increased opportunity for participating in professional development</li> </ul>	No
4. Specifies how professional development funds will be used to remove the school from improvement status	No
5. Annual measurable objectives for continuous and substantial progress by each group of students to meet proficient levels of achievement on the ISTEP+ (by 2013-2014)	Yes
6. Documentation that written notice about the identification of a school in improvement was provided to the parents of each student enrolled in the school in a language parents can understand.	Yes
7. Specifies the responsibilities of the school, the LEA, and the SEA including technical assistance to be provided	Yes
8. Strategies to promote effective parental involvement in the school	No
9. Activities before and after school, during summer, and during any extension of the school year	No
10. Incorporates a teacher-mentoring program (in addition to any the LEA might offer for new teachers)	No

## Attachment G

## Pine View Title I Schoolwide Plan

**Schoolwide Plan:** Section 1114 (b) (2) Any school that operates a schoolwide program shall first develop (or amend a plan for such a program that was in existence on the day before the date of enactment of the NCLB Act of 2001), in consultation with the LEA and its school support team or other technical assistance provider under section 1117, a comprehensive plan for reforming the total instructional program in the school that:

- i. Describes how the school will implement the ten components described below
- ii. Describes how the school will use resources under this part and other sources to implement the ten components
- iii. Includes a list of SEA programs and other federal programs that will be consolidated in the schoolwide program
- iv. Describes how the school will provide individual student academic assessment results in a language the parents can understand, including an interpretation of those results, to the parents of a child who participates in the academic assessments required by the SEA plan.

### Ten Components of a Schoolwide Plan\*:

	Compliant
1. A comprehensive needs assessment of the whole school	No
2. Implementation of schoolwide reform strategies that:	No-missing underlined
<input type="checkbox"/> Provide opportunities for all children to meet proficient and advanced levels of student academic achievement	
<input type="checkbox"/> Use effective methods and instructional strategies that are based on scientifically based research that:	
<input type="checkbox"/> Strengthens the core academic program	
<input type="checkbox"/> <u>Increases the amount of learning time</u>	
<input type="checkbox"/> <u>Includes strategies for serving underserved populations</u>	
<input type="checkbox"/> <u>Includes strategies to address the needs of all children in the school, but particularly low achieving children and those at risk of not meeting state standards</u>	
<input type="checkbox"/> <u>Address how the school will determine if those needs of the children have been met</u>	
<input type="checkbox"/> <u>Are consistent with and are designed to implement state and local improvement plans, if any</u>	
3. Highly qualified teachers in all core content area classes	No
4. High quality and on-going professional development for teachers, principals, and paraprofessionals	No
5. Strategies to attract high-quality, highly qualified teachers to this school	No
6. Strategies to increase parental involvement, such as literary services	Yes
7. Plans for assisting preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First, or a state-run preschool program	Yes
8. Opportunities and expectations for teachers to be included in the decision making related to the use of academic assessment results leading to the improvement of student achievement	Yes
9. Activities and programs at the school level to ensure that students having difficulty mastering proficient and advanced levels of the academic achievement are provided with effective, timely additional assistance	No
10. Coordination and integration of federal, state and local funds; and resources such as in-kind services and program components	No